

Comments

COUNTY OF PLACER
COMMENTS ON DRAFT TAHOE MUNICIPAL PERMIT
SEPT 15, 2011

Attachment 2 - Placer County Draft Permit Comments

Comment #	Section	Page	Comment
General Comments			
1	General		We appreciate the Lahontan Water Board's work to create a balanced program that has attainable goals without being overly prescriptive or burdensome.
Order			
2	F.3	9	First sentence; after "...enforcement, and other actions" please replace "will" with "are intended to".
3	F.4	9	After "Lake Clarity Crediting Program" please add "(Attachment D of this permit)".
4	F.7	10	Municipalities are required to annually demonstrate on a catchment basis that land disturbing activities have not increased loading of fine sediment, nitrogen, and phosphorus. This provision will require registration of <u>every</u> catchment where <u>any</u> development/re-development occurs, just to demonstrate that project has installed the appropriate (and required) BMPs, and that the permittee isn't counting such activities toward load reduction requirements. Catchment registration should not be required simply to prove that point; there is much effort required for catchment registration, and land disturbing activities can occur anywhere.
5	F.6	10	Where is Basin Plan Table 5.6-1? Please add as an attachment
6	I.B	11	Lawn watering, individual residential car washing, de-chlorinated swimming pool, spa, or hot tub water, and fire fighting flows have been removed from this list of discharge exceptions. Have these been removed due to a revision of federal law, or is this a Regional Board decision? What is the rationale/justification for doing so?
7	II.E	12	States that the Executive Officer is the only one that can grant a grading variance. Historically, this responsibility has been delegated to TRPA. Is that still the case? If so, the way the statement is written is unclear. Maybe reword to saymay be granted in writing by the Executive Officer
8	II.B	12	What is the definition of "condition of nuisance"? This is a very broad and subjective provision, especially when included in a list of prohibitions.
9	II.G	12	This should be placed into appropriate context. Isn't the concern discharge to surface waters or land surface?
10	II. H	12	Isn't this essentially the same as II.K? Couldn't these be combined?
11	III.A.1.b	13	Prohibiting discharge of non-stormwater to the permittee's collection, conveyance, and treatment facilities from the listed sources seems to preclude the concept of public/private partnerships for treatment facilities.
12	III.A.1.b (5)	13	Is all swimming pool and hot tub water prohibited, or just chlorinated pool and hot tub water? If it can be discharged if non-chlorinated than please indicate.
13	III.A.2.a	14	We cannot regulate or control runoff from another municipality. It may be possible to enter into an agreement whereby that agency agrees to certain standards or conditions, but each would retain responsibility for their own compliance.
14	III.A.2.d, f	14	Request that "Control" be changed to "Monitor and enforce". We can not "control" actions by others but we can establish regulations and implement enforcement actions to maintain water quality.
15	III.A.2.d	14	This provision should acknowledge the exceptions listed in III.A.1.b

Response *

PLCR R2: The draft permit has been revised as suggested.

PLCR R3: The draft permit has been revised as suggested.

PLCR R4: The draft permit has been edited to require Permittees to conduct a single assessment at the end of the Permit term to determine if development or other land uses changes have caused pollutant loading to increase beyond baseline levels.

PLCR R5: Basin Plan Table 5.6-1 can be found in the Water Quality Control Plan for the Lahontan Region, at the end of Chapter 5.6.

PLCR R6: The referenced section has been edited for consistency with federal regulations. The referenced items have been added back to the list of non-stormwater discharge exceptions.

PLCR R7: Variances to the May 1 - October 15 grading season are subject to Water Board approval per Basin Plan Chapter 5.3.

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13	III.A.2.a	14	We cannot regulate or control runoff from another municipality. It may be possible to enter into an agreement whereby that agency agrees to certain standards or conditions, but each would retain responsibility for their own compliance.
14	III.A.2.d, f	14	Request that "Control" be changed to "Monitor and enforce". We can not "control" actions by others but we can establish regulations and implement enforcement actions to maintain water quality.
15	III.A.2.d	14	This provision should acknowledge the exceptions listed in III.A.1.b

Response *

PLCR R8: Under the California Water Code, section 13050(m), nuisance means anything which meets all of the following requirements: (1) Is injurious to health, or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property, (2) Affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal, (3) Occurs during, or as a result of, the treatment or disposal of wastes.

PLCR R9: Water Board staff have edited the discharge prohibitions for consistency with the Water Quality Control Plan for the Lahontan Region. The referenced prohibition has been rewritten to state that stormwater discharges may not cause or contribute to a violation of receiving water standards.

PLCR R10: Water Board staff have edited the discharge prohibitions for consistency with the Water Quality Control Plan for the Lahontan Region. The referenced redundancy has been eliminated.

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PLCR R11: The referenced permit section does not preclude Permittees from entering into partnerships with private entities for stormwater treatment; the referenced section prohibits non – stormwater discharges.

PLCR R12: De-chlorinated swimming pool and spa discharges are included in the list of non-storm water discharge prohibitions.

PLCR R13: Title 40, Code of Federal Regulations, Section 122.26 requires municipalities to maintain legal authority to control through interagency agreement, the contribution of pollutants from one municipal jurisdiction to another. If Permittees chose not to enter into such agreements, they may rely on the Water Board to address any inter-jurisdiction discharge issues.

PLCR R14: Title 40, Code of Federal Regulations, Section 122.26 requires municipalities to control through ordinance, permit, contract, order or similar means, the contribution of pollutants to the municipal storm sewer by storm water discharges associated with industrial activity and the quality of storm water discharged from sites of industrial activity.

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15	III.A.2.d	14	This provision should acknowledge the exceptions listed in III.A.1.b

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PLCR R15: Title 40, Code of Federal Regulations, Section 122.26 requires municipalities to control through ordinance, order or similar means the discharge to a municipal separate storm sewer of spills, dumping or disposal of materials other than storm water. The Permittees must have this ability regardless of the non-stormwater discharges allowed by the draft permit.

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16	III.A.3	14	The March 15, 2012 due date will not allow adequate time to provide a legal statement of authority, especially if ordinance changes are necessary. Additionally, the pending draft NPDES Phase II General Permit will require many revisions to current ordinances and standards; it would make sense for Placer County to consider all needed revisions at the same time, for both permits. Suggest adding a year to the date shown.
17	III.B.1.b	15	For prioritization of construction sites this provision requires permittees to consider "fine sediment source potential". How is this to be evaluated on project scale? Is this only a subjective assessment, or is it anticipated that calculations of some type be generated?
18	IV.A	19	Third paragraph indicates that if permittee wants to revised baseline loads based on better information following permit adoption, that "it may submit a request to the Water Board to amend its baseline load estimate". This implies that the Water Board has complete/sole discretion regarding consideration of the new/better information. We would like to see a commitment by the Regional Board to revisit baseline load estimates if/when better information is available. Our concerns regarding the modeling limitations and future refinement are detailed in the September 1, 2011 letter, attached.
19	Table IV.B	20	Table needs to be completed before adoption.
20	IV.C	20	First sentence; suggest changing "how they will meet" to "how they intend to meet".
21	IV.C.1	20	Requires the PLRP to "include a list of catchments that will likely be registered". This is fine, except that (see comment regarding F.7) unpredictable catchment registration may result from having to include all land disturbing activities. Our objective would be to register catchments based on planned water quality projects/actions that provide the greatest benefit. The notion of catchment registration for other purposes does not seem productive.
22	IV.D	21	Development Impacts - is this information in addition to the Catchment registration we are completing? How does the Regional Board expect to see this requirement met? Does this imply that we must register every catchment where any land disturbance occurs? If our load reductions are based on the PLRP that shows work in only certain catchment areas, why is it necessary to register other catchment areas just to demonstrate that project impacts have been mitigated?
23	IV.E.1	22	What is the "documentation of all projects" mean? In what form?
24	IV.E.2	22	What if the catchment registration process has not been completed for all projects completed up to October 15, 2011? How can that information be reported in the Progress Report?
25	Table V	22	Table of Required Submittals - please include <u>all</u> permit submittal dates including VI D where the permittee must file 180 days in advance of order expiration, and monitoring /reporting dates per Attachment C.
26	VI.B	22	Reference should be to Attachment G not F.
27	VI.C	22	Last sentence; "All Permittee submittals must be adequate to implement the requirements of this Order"- This is a very subjective statement, open to interpretation and disagreement.
Attachment A Fact Sheet			
28		3	Last sentence; "14 percent" should be "17 percent", per Appendix B.
29		4	Third paragraph; This statement suggests that the California permittees are solely responsible for achieving TMDL requirements.
30		5	Fifth paragraph, last sentence; What does "and if appropriate" mean in this context?
31		6	First paragraph, last sentence; What does "and if appropriate" mean in this context?
32		7	Storm Water Management Plans section, sentence 2. The word "pervious", should be "previous".
Attachment C Monitoring Program			

*Response numbers correspond to Placer County "Comment #"

Response *

PLCR R16: The draft permit has been edited to change the referenced date to March 15, 2013.

PLCR R17: The draft permit provides the Permittees broad latitude to establish construction site priorities based on level of disturbance, project location, and other factors. The potential of a given site to be a source of fine sediment particles will likely be a subjective assessment based on slope, area of disturbance, soil type, and other variables. The permit does not preclude the use of any quantitative techniques.

PLCR R18: The draft permit has been edited to allow the Permittees to propose changes to the baseline pollutant load values should new information become available.

PLCR R19: The information needed to complete the referenced table was not available for the tentative permit review. The table is now complete in the draft permit.

PLCR R20: The draft permit has been edited as suggested.

PLCR R22: The draft permit has been edited to require Permittees to conduct a single assessment at the end of the Permit term to determine if development or other land uses changes have caused pollutant loading to increase beyond baseline levels.

Comments				Response *
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16	III.A.3	14	The March 15, 2012 due date will not allow adequate time to provide a legal statement of authority, especially if ordinance changes are necessary. Additionally, the pending draft NPDES Phase II General Permit will require many revisions to current ordinances and standards; it would make sense for Placer County to consider all needed revisions at the same time, for both permits. Suggest adding a year to the date shown.	<p>PLCR R23: The draft permit has been edited to clarify that the “documentation of projects” means that Permittees shall provide a list of all erosion control and stormwater treatment projects constructed prior to 2004.</p>
17	III.B.1.b	15	For prioritization of construction sites this provision requires permittees to consider “fine sediment source potential”. How is this to be evaluated project scale? Is this only a subjective assessment, or is it anticipated that calculations of some type be generated?	
18	IV.A	19	Third paragraph indicates that if permittee wants to revised baseline loads based on better information following permit adoption, that “it may submit a request to the Water Board to amend its baseline load estimate”. This implies that the Water Board has complete/sole discretion regarding consideration of the new/better information. We would like to see a commitment by the Regional Board to revisit baseline load estimates if/when better information is available. Our concerns regarding the modeling limitations and future refinement are detailed in the September 1, 2011 letter attached.	<p>PLCR R24: The intent of the referenced requirement is to ensure that Permittees are brought “up to date” with catchment registration by October 1, 2013 (date changed from March 15, 2013 per Permittee suggestion). The Progress Report requirement compels the Permittees to complete the catchment registration process for all catchments where loads were reduced between May 2004 and October 2011. Conducting this analysis by the middle of the Permit term will provide the Water Board and each Permittee with a better understanding of the magnitude of remaining load reduction to achieve the first five year load reduction target.</p>
19	Table IV.B	20	Table needs to be completed before adoption.	
20	IV.C	20	First sentence; suggest changing “how they will meet” to “how they intend to meet”.	
21	IV.C.1	20	Requires the PLRP to “include a list of catchments that will likely be registered”. This is fine, except that (see comment regarding F.7) unpredictable catchment registration may result from having to include all land disturbing activities. Our objective would be to register catchments based on planned water quality projects/actions that provide the greatest benefit. The notion of catchment registration for other purposes does not seem productive.	
22	IV.D	21	Development Impacts - is this information in addition to the Catchment registration we are completing? How does the Regional Board expect to see this requirement met? Does this imply that we must register every catchment where any land disturbance occurs? If our load reductions are based on the PLRP that shows work in only certain catchment areas, why is it necessary to register other catchment areas just to demonstrate that project impacts have been mitigated?	
23	IV.E.1	22	What is the “documentation of all projects” mean? In what form?	
24	IV.E.2	22	What if the catchment registration process has not been completed for all projects completed up to October 15, 2011? How can that information be reported in the Progress Report?	
25	Table V	22	Table of Required Submittals - please include all permit submittal dates including VI.D where the permittee must file 180 days in advance of order expiration, and monitoring /reporting dates per Attachment C.	
26	VI.B	22	Reference should be to Attachment G not F.	
27	VI.C	22	Last sentence; “All Permittee submittals must be adequate to implement the requirements of this Order”. This is a very subjective statement, open to interpretation and disagreement.	
Attachment A Fact Sheet				<p>PLCR R25: The referenced table has been updated to include all applicable submittal dates.</p>
28		3	Last sentence; “14 percent” should be “17 percent”, per Appendix B.	
29		4	Third paragraph; This statement suggests that the California permittees are solely responsible for achieving TMDL requirements.	<p>PLCR R26: The draft permit has been corrected to reference Attachment G rather than Attachment F.</p>
30		5	Fifth paragraph, last sentence; What does “and if appropriate” mean in this context?	
31		6	First paragraph, last sentence; What does “and if appropriate” mean in this context?	<p>PLCR R27: Each submittal requirement sets expectations for what must be included. The referenced language states that submittals must meet those specific requirements</p>
32		7	Storm Water Management Plans section, sentence 2. The word “pervious”, should be “previous”.	
Attachment C Monitoring Program				
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COUNTY OF PLACER COMMENTS ON DRAFT TAHOE MUNICIPAL PERMIT SEPT 15, 2011				PLCR R28: The draft permit has been corrected from 14 to 17 percent.
16	III.A.3	14	The March 15, 2012 due date will not allow adequate time to provide a legal statement of authority, especially if ordinance changes are necessary. Additionally, the pending draft NPDES Phase II General Permit will require many revisions to current ordinances and standards; it would make sense for Placer County to consider all needed revisions at the same time, for both permits. Suggest adding a year to the date shown.	PLCR R29: The referenced statement highlights the draft permit as an important TMDL implementation tool. The Permittees are not responsible for achieving required load reductions from atmospheric, forest, or stream channel erosion sources, nor are they responsible for reducing loads from Nevada municipalities.
17	III.B.1.b	15	For prioritization of construction sites this provision requires permittees to consider "fine sediment source potential". How is this to be evaluated on project scale? Is this only a subjective assessment, or is it anticipated that calculations of some type be generated?	
18	IV.A	19	Third paragraph indicates that if permittee wants to revised baseline loads based on better information following permit adoption, that "it may submit a request to the Water Board to amend its baseline load estimate". This implies that the Water Board has complete/sole discretion regarding consideration of the new/better information. We would like to see a commitment by the Regional Board to revisit baseline load estimates if/when better information is available. Our concerns regarding the modeling limitations and future refinement are detailed in the September 1, 2011 letter, attached.	
19	Table IV.B	20	Table needs to be completed before adoption.	
20	IV.C	20	First sentence; suggest changing "how they will meet" to "how they intend to meet".	PLCR R30: The referenced text means that the Water Board has the discretion to determine whether the Pollutant Load Reduction Plans meet permit requirements. The draft permit has been edited to add text to clarify this point.
21	IV.C.1	20	Requires the PLRP to "include a list of catchments that will likely be registered". This is fine, except that (see comment regarding F.7) unpredictable catchment registration may result from having to include all land disturbing activities. Our objective would be to register catchments based on planned water quality projects/actions that provide the greatest benefit. The notion of catchment registration for other purposes does not seem productive.	
22	IV.D	21	Development Impacts - is this information in addition to the Catchment registration we are completing? How does the Regional Board expect to see this requirement met? Does this imply that we must register every catchment where any land disturbance occurs? If our load reductions are based on the PLRP that shows work in only certain catchment areas, why is it necessary to register other catchment areas just to demonstrate that project impacts have been mitigated?	
23	IV.E.1	22	What is the "documentation of all projects" mean? In what form?	
24	IV.E.2	22	What if the catchment registration process has not been completed for all projects completed up to October 15, 2011? How can that information be reported in the Progress Report?	PLCR R31: See response PLCR R30 above.
25	Table V	22	Table of Required Submittals - please include <u>all</u> permit submittal dates including VI.D where the permittee must file 180 days in advance of order expiration, and monitoring /reporting dates per Attachment C.	
26	VI.B	22	Reference should be to Attachment G not F.	PLCR R32: The draft permit has changed the typographical error from "pervious" to "previous".
27	VI.C	22	Last sentence; "All Permittee submittals must be adequate to implement the requirements of this Order"- This is a very subjective statement, open to interpretation and disagreement.	
Attachment A Fact Sheet				
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33	Table I.B	3	Table need to be completed.	PLCR R33: The information needed to complete the referenced table was not available for the tentative permit review. The completed table is included in the draft permit.
34	I.C	3	References Lake Crediting Program Handbook as version 1.0, but Attachment D is version 0.99. Are these the same or should a different version of the handbook be attached? Also, if the handbook is updated during the course of the permit will the updated version meet permit requirements?	
35	I.C	3	References the Crediting Program Handbook as "Attachment 1". It should be "Attachment D".	PLCR R34: The Lake Clarity Crediting Handbook update was in process and the updated version 1.0 was not available for the tentative permit review. Water Board staff do not anticipate updating the Handbook during the course of the permit term. However, if the need to change the Handbook does arise, the Permit can be updated accordingly. The nature and extent of future Handbook changes would determine whether the Permit can be updated under the Executive Officer's authority or whether the Water Board must consider the update.
36	I.D	4	Requires registration of 2 catchments by March 15, 2012. If permit adoption is delayed, will this date change?	
37	General	all	Please add a table of required submittals with dates (such as in the order) as well as making reference in the order that there are additional submittal dates included in Attachment C.	
38	III.A.4	8	Second paragraph; how will permittees be expected to "demonstrate" the approach adequacy? What form will this take?	
39	III.B.10	10	Is there any conflict between section 1 and section 10, with regard to the monitoring term, ie, "three successive years" vs. "remainder of this permit term"? Doesn't the permit term continue until adoption of a new permit?	
40	III.C	11	For BMP effectiveness monitoring - reference should be Section III B not III A	
41	III.D	11	CEDEN reference - please add website address of ceden.org . Will Lahontan Regional Board be using this site as well? Currently there does not appear to be any data that is available to review in Region 6.	
42	IV.A	12-13	Is it anticipated that anytime there is any development activity permitted within a catchment, that catchment must then be registered? See also our comment for Section IV.D above.	
43	IV.B	13	In the section heading, please add "Stormwater" before "Facilities Inspections" for clarification. Also , the section referenced should be Section II A, not IA.	
44	IV.E	13	Does "annually submit a comprehensive electronic report", mean through the SMARTS system, or in a different form? If different, what format is expected?	
45	IV.G	15	States that "Permittees shall comply with the "General Provisions for Monitoring and Reporting dated Sept 1, 1994". Is this "Attachment G", or some other document ?	
Attachment G Standard Provisions				
46	A.9.c (4)	4	Reference to Attachment C is incorrect.	
47	B.1	5	States the Order expires October 15, 2010. This needs to be updated.	
48	B.5.b (1) and (3)	7	References to SDRWCQB are incorrect.	
				PLCR R35: "Attachment 1" has been corrected to "Attachment D".
				PLCR R36: All compliance dates are subject to change depending on the timing of Water Board adoption.
				PLCR R37: The referenced table has been edited to include submittal dates associated with the Monitoring and Reporting Program.
*Response numbers correspond to Placer County "Comment #"				

Comments				Response *
COUNTY OF PLACER COMMENTS ON DRAFT TAHOE MUNICIPAL PERMIT SEPT 15, 2011				
33	Table I.B	3	Table need to be completed.	PLCR R38: In their monitoring plan, Permittees are expected to describe how their proposed sampling program will provide representative nutrient concentrations. The draft permit acknowledges that sampling frequency for nutrients may be less frequent than that for fine sediment particles while still providing representative concentration data.
34	I.C	3	References Lake Crediting Program Handbook as version 1.0, but Attachment D is version 0.99. Are these the same or should a different version of the handbook be attached? Also, if the handbook is updated during the course of the permit will the updated version meet permit requirements?	
35	I.C	3	References the Crediting Program Handbook as "Attachment 1". It should be "Attachment D".	
36	I.D	4	Requires registration of 2 catchments by March 15, 2012. If permit adoption is delayed, will this date change?	
37	General	all	Please add a table of required submittals with dates (such as in the order) as well as making reference in the order that there are additional submittal dates included in Attachment C.	
38	III.A.4	8	Second paragraph; how will permittees be expected to "demonstrate" the approach adequacy? What form will this take?	
39	III.B.10	10	Is there any conflict between section 1 and section 10, with regard to the monitoring term, ie, "three successive years" vs. "remainder of this permit term"? Doesn't the permit term continue until adoption of a new permit?	
40	III.C	11	For BMP effectiveness monitoring - reference should be Section III B not III A	
41	III.D	11	CEDEN reference - please add website address of ceden.org . Will Lahontan Regional Board be using this site as well? Currently there does not appear to be any data that is available to review in Region 6.	
42	IV.A	12-13	Is it anticipated that anytime there is any development activity permitted within a catchment, that catchment must then be registered? See also our comment for Section IV.D above.	
43	IV.B	13	In the section heading, please add "Stormwater" before "Facilities Inspections" for clarification. Also, the section referenced should be Section II A, not IA.	PLCR R39: The draft permit has been corrected by removing item 10 from Section III.B.
44	IV.E	13	Does "annually submit a comprehensive electronic report", mean through the SMARTS system, or in a different form? If different, what format is expected?	
45	IV.G	15	States that "Permittees shall comply with the "General Provisions for Monitoring and Reporting dated Sept 1, 1994". Is this "Attachment G", or some other document ?	PLCR R40: The draft permit has been corrected to reference Section III.B
Attachment G Standard Provisions				
46	A.9.c (4)	4	Reference to Attachment C is incorrect.	PLCR R41: The website reference for CEDEN has been added to the draft permit.
47	B.1	5	States the Order expires October 15, 2010. This needs to be updated.	
48	B.5.b (1) and (3)	7	References to SDRWCQB are incorrect.	
				PLCR R42: The draft permit has been edited to require Permittees to conduct a single assessment at the end of the Permit term to determine if development or other land uses changes have caused pollutant loading to increase beyond baseline levels.
				PLCR R43: The corrections have been made in the draft permit.
				PLCR R44: Electronic reports need not be submitted in the SMARTS system, but Water Board staff will work with Permittees who wish to do so. Electronic files (.pdf) may be submitted directly to Water Board staff.
*Response numbers correspond to Placer County "Comment #"				

Comments				Response *
COUNTY OF PLACER COMMENTS ON DRAFT TAHOE MUNICIPAL PERMIT SEPT 15, 2011				
33	Table I.B	3	Table need to be completed.	PLCR R45: Reference to “Attachment G” has been added to the draft permit.
34	I.C	3	References Lake Crediting Program Handbook as version 1.0, but Attachment D is version 0.99. Are these the same or should a different version of the handbook be attached? Also, if the handbook is updated during the course of the permit will the updated version meet permit requirements?	
35	I.C	3	References the Crediting Program Handbook as "Attachment 1". It should be "Attachment D".	PLCR R46: Reference to “Attachment C” has been replaced with reference to “Attachment”G”.
36	I.D	4	Requires registration of 2 catchments by March 15, 2012. If permit adoption is delayed, will this date change?	
37	General	all	Please add a table of required submittals with dates (such as in the order) as well as making reference in the order that there are additional submittal dates included in Attachment C.	PLCR R47: The expiration date has been updated to December 6, 2016 in the updated permit.
38	III.A.4	8	Second paragraph; how will permittees be expected to "demonstrate" the approach adequacy? What form will this take?	
39	III.B.10	10	Is there any conflict between section 1 and section 10, with regard to the monitoring term, ie, "three successive years" vs. "remainder of this permit term"? Doesn't the permit term continue until adoption of a new permit?	PLCR R48: References to SDRWQCB have been replaced with reference to the Lahontan Water Board.
40	III.C	11	For BMP effectiveness monitoring - reference should be Section III B not III A	
41	III.D	11	CEDEN reference - please add website address of ceden.org . Will Lahontan Regional Board be using this site as well? Currently there does not appear to be any data that is available to review in Region 6.	
42	IV.A	12-13	Is it anticipated that anytime there is any development activity permitted within a catchment, that catchment must then be registered? See also our comment for Section IV.D above.	
43	IV.B	13	In the section heading, please add "Stormwater" before "Facilities Inspections" for clarification. Also , the section referenced should be Section II A, not IA.	
44	IV.E	13	Does "annually submit a comprehensive electronic report", mean through the SMARTS system, or in a different form? If different, what format is expected?	
45	IV.G	15	States that "Permittees shall comply with the "General Provisions for Monitoring and Reporting dated Sept 1, 1994". Is this "Attachment G", or some other document ?	
Attachment G Standard Provisions				
46	A.9.c (4)	4	Reference to Attachment C is incorrect.	
47	B.1	5	States the Order expires October 15, 2010. This needs to be updated.	
48	B.5.b (1) and (3)	7	References to SDRWCQB are incorrect.	
*Response numbers correspond to Placer County “Comment #”				